

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DECKERS OUTDOOR CORPORATION,)
v.)
Plaintiff,)
XIAO MEI, et al.,)
Defendants.)
Case No. 15-cv-1191
Judge Manish S. Shah
Magistrate Judge Young B. Kim

**PLAINTIFF DECKERS OUTDOOR CORPORATION'S
MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff Deckers Outdoor Corporation (“Deckers”) files this Motion requesting leave to file the following documents under seal: (1) Plaintiff’s Amended Complaint which identifies domain name registration information for the Defendant Domain Names and lists the Online Marketplace Accounts; (2) Schedule A attached to the Amended Complaint, which includes a list of the Defendant Domain Names, domain name registration information, and Online Marketplace Accounts; and (2) screenshot printouts showing the active Defendant Internet Stores and WHOIS information for the Defendant Domain Names (Exhibits 22 and 23 to the Declaration of Graham Thatcher). In this action, Deckers is requesting temporary *ex parte* relief based on an action for trademark counterfeiting and cybersquatting.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purposes of the underlying law and would interfere with this Court's power

to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Deckers will move to unseal these documents.

Dated this 9th day of February 2015.

Respectfully submitted,

/s/ Justin R. Gaudio

Kevin W. Guynn
Amy C. Ziegler
Justin R. Gaudio
Jessica L. Bloodgood
Greer, Burns & Crain, Ltd.
300 South Wacker Drive, Suite 2500
Chicago, Illinois 60606
312.360.0080
312.360.9315 (facsimile)
kguynn@gbclaw.net
aziegler@gbclaw.net
jgaudio@gbclaw.net
jbloodgood@gbclaw.net

Attorneys for Plaintiff Deckers Outdoor Corp.